UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

GREGORY COLBURN et al.,

Defendants

Case No. 1:19-cr-10080-NMG

DEFENDANT JOHN WILSON'S MOTION FOR
LEAVE TO FILE UNDER SEAL A BRIEF OPPOSING
NON-PARTY UNIVERSITY OF SOUTHERN CALIFORNIA'S MOTION TO QUASH

Defendant John Wilson respectfully moves this Court for leave to file under seal his

forthcoming opposition to the Motion to Quash trial subpoena filed by the University of

Southern California. As with USC's motion (which the Court allowed to be filed under seal,

Dkt. 2176), Defendant's opposition will include sensitive, confidential, and personally

identifiable information. Accordingly, under Local Rule 7.2, Defendant asks that the Court grant

leave to file under seal his opposition brief. Defendant will publicly file a redacted version of the

brief and will provide the Government and USC's counsel unredacted copies of his opposition

briefing.

Respectfully submitted,

Counsel for John Wilson

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Date: September 16, 2021

CERTIFICATE OF COMPLIANCE WITH LOCAL RULES 7.1 AND 112.1

The undersigned counsel hereby certifies that counsel for the Defendant have attempted to confer with counsel for the government and attempted in good faith to resolve or narrow the issues raised by this motion. The government has not responded as to its position on this motion.

/s/ Michael Kendall
Michael Kendall

CERTIFICATE OF SERVICE

I hereby certify that the above document is being filed on the date appearing in the header through the ECF system, which will send true copies to the attorneys of record.

/s/ Michael Kendall
Michael Kendall

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